

Five-Year Review Report
Asbestos Dump Superfund Site
Meyersville, Morris County, New Jersey



Prepared by:
United States Environmental Protection Agency
Region 2
New York, New York

September 2010

Executive Summary

The Asbestos Dump Site (Site) consists of four separate properties which were addressed in three discrete operable units (OUs). OU1 consists of the Millington site, located in Millington, New Jersey. OU2 consists of the New Vernon Road and White Bridge Road "satellite" sites, both of which are located in Meyersville, New Jersey. OU3 consists of the third satellite site, known as the Dietzman Tract, which is located in Harding Township, New Jersey. OU3 is under the jurisdiction of the U.S. Department of Interior.

The Site was placed on the National Priorities List (NPL) in September 1983. A Remedial Investigation (RI) for the Site was conducted by the National Gypsum Company (NGC), the Potentially Responsible Party (PRP), between 1986 and 1987. The RI sufficiently delineated the nature and extent of contamination for OU1; however, EPA determined that additional investigations were needed to complete the characterization of contamination for OU2 and OU3. Subsequent RI activities for OU2 were conducted by EPA and completed in 1991. OU3 RI activities were conducted by the U.S. Fish and Wildlife Service (FWS) and completed in 1997. Records of Decisions (RODs) for each of the three operable units, OU1, OU2 and OU3, were signed in September 1988, September 1991 and September 1998, respectively. The selected remedy for OU1 included the installation of a soil cover, slope stabilization, monitoring and implementation of institutional controls. The remedy for OU2 included the solidification/stabilization of asbestos-contaminated soils at the New Vernon Road and White Bridge Road sites along with monitoring and implementation of institutional controls. The OU3 remedy included the removal and off-site disposal of non-asbestos-containing contaminated materials, consolidation and capping of asbestos-containing materials, and implementation of institutional controls.

Remedial actions for the Site were completed by the year 2000. As a result of these actions, cleanup levels protective of human health and the environment have been achieved. The Site was deleted from the NPL in July 2010. The OU1 property is currently owned by Tifa Realty, Inc. Portions of OU2-New Vernon Road are owned by the FWS and the State of New Jersey while OU2-White Bridge Road remains a privately owned residential property with a horse boarding business.

This is the third Five-Year Review for the Asbestos Dump Superfund Site. The Five-Year Review found that the implemented remedies for OU1 and OU2 are functioning as intended by the decision documents. Furthermore, the remedies are protective of human health and the environment. A Five-Year Review for OU3 is being prepared by the U.S. Department of Interior/Fish and Wildlife Service as a separate report.

Five-Year Review Summary Form

SITE IDENTIFICATION						
Site name (from WasteLAN): A	Asbestos Dump					
EPA ID (from WasteLAN): NJD980654149						
Region: 2	State: NJ	City/County: Millington, Morris County				
		SITE STATUS				
NPL status: ☐ Final ■ Dele	eted Other (spec	cify)				
Remediation status (choose al	I that apply): 🗆 [Under Construction ■ Constructed ■ Operating				
Multiple OUs? ■ YES □	NO	Construction completion date: 6/30/2000				
Has site been put into reuse?	P YES □	NO D N/A Portions of the site are in use.				
	D.	EVIEW STATUS				
Y and agains II EDA II State						
Lead agency: ■ EPA □ State	·	r Federal Agency				
Author name: Theresa Hwilk		· · · · · · · · · · · · · · · · · · ·				
Author title: Remedial Project	t Manager	Author affiliation: EPA				
Review period:** 09/2005 to	09/2010					
Date(s) of site inspection: 0)2/01/2010					
Type of review: ■ Post-SARA □ Pre-SARA □ NPL-Removal only □ Non-NPL Remedial Action Site □ NPL State/Tribe-lead □ Policy □ Regional Discretion						
Review number: 1 (first	st) 🗆 2 (second)	■ 3 (third) □ Other (specify)				
Triggering action: ☐ Actual RA Onsite Construction ☐ Construction Completion ☐ Other (specify)	· · · · · · · · · · · · · · · · · · ·	Actual RA Start at OU# Previous Five-Year Review Report				
Triggering action date (from	WasteLAN): 09/2	2005 (Previous Five-Year Review)				
Does the report include reco	mmendation(s) a	nd follow-up action(s)? ■ yes □ no				

^{* [&}quot;OU" refers to operable unit.]

** [Review period should correspond to the actual start and end dates of the Five-Year Review in WasteLAN.]

Five-Year Review Summary Form (continued)

Issues, Recommendations, and Follow-Up Actions

This report identifies one issue that requires follow-up activities. Asbestos was detected in one upstream sediment sample. This sample is inconsistent with previously reported data; therefore, additional sampling will be performed to confirm the presence of asbestos in the vicinity of the upstream sample location.

Please see Section VIII for details.

Other Comments on Operation, Maintenance, Monitoring, and Institutional Controls

Routine monitoring and maintenance will continue to be conducted in accordance with the Site's Operation and Maintenance (O&M) Plan. Institutional controls, such as deed notices with land use restrictions, are in place. Adjustments to O&M activities, including monitoring frequencies and sample locations, will be made on an ongoing basis as needed.

Protectiveness Statement

The implementation of the remedial actions at OU1 and OU2, along with the institutional controls identified above, have interrupted potential exposures. The remedy is functioning as intended by the decision documents and is protective of public health and the environment.

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I. Introduction

This Five-Year Review for Operable Units (OU) 1 and 2 was conducted by Theresa Hwilka, U.S. Environmental Protection Agency (EPA) Remedial Project Manager (RPM). This review was conducted pursuant to Section 121(c) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. Section 9601, et seq., and 40 C.F.R. 300.430(f)(4)(ii) and in accordance with the Comprehensive Five-Year Review Guidance, OSWER Directive 9355.7-03B-P (June 2001). The purpose of a Five-Year Review is to determine whether the remedies at the site are protective of human health and the environment and function as intended by the decision documents. This document will become part of the site file.

This is the third Five-Year Review for OU1 and OU2 of the Asbestos Dump Superfund Site (Site). OU3 is under the jurisdiction of the U.S. Department of Interior. The first Five-Year Review was completed in September 2000 and addressed all OUs at the Site. In September 2005, EPA conducted a second Five-Year Review for OU1 and OU2. The U.S. Department of the Interior conducted a concurrent Five-Year Review for OU3. A Five-Year Review for OU3 is being prepared by the U.S. Department of Interior/Fish and Wildlife Service as a separate report.

II. Site Chronology

Table 1, below, summarizes site-related events from discovery to present operation and maintenance activities:

Table 1 – Chronology of Site Events				
Event/Activity	Date			
Manufacturing of asbestos began at Millington Plant	1927			
Asbestos-containing material dumped at OU1 Millington property	1930's-1960's			
Asbestos-containing materials dumped at OU2 and OU3 properties	1960's-1970's			
Site placed on the National Priorities List	September 1983			
EPA issued Notice Letter to National Gypsum Company	September 1984			
EPA issued Administrative Order on Consent to National Gypsum to conduct the RI/FS	April 1985			
National Gypsum performed RI	1985-1986			
RI Report submitted (EPA deemed it adequate for Millington property but not for the other contaminated properties and divided site into separate OUs)	May 1987			
OU1 Millington ROD	September 1988			
EPA issued a UAO to National Gypsum to perform RD/RA at OU1	September 1989			
EPA collected and analyzed soil and dust samples from OU2	August 1990			
National Gypsum filed for bankruptcy	October 1990			
Removal activities at OU2 conducted	Fall 1990			

OU2 RI/FS	1990-1991	
OU2 New Vernon Road and White Bridge Road - ROD	September 1991	
Explanation of Significant Differences to modify OU2 solidification depth. Depth was decreased to ensure that the solidified/stabilized mass remained above the water table.	October 1993	
OU2 Remedial Action begins	August 1994	
The Remedial Action Report for the White Bridge Road portion of OU2 was approved	December 1997	
EPA acquires the OU2 New Vernon Road property	June 1998	
OU3 ROD	September 1998	
OU1 Remedial Action	June 1999-June 2000	
OU1 Construction Complete	June 2000	
First Five-Year Review completed	September 2000	
EPA approved the OU1 Remedial Action Report and 30-Year Operation and Maintenance Plan	September 2001	
EPA deleted the OU2 White Bridge portion of the Site from the NPL	February 2002	
A 25-Acre portion of the New Vernon Road property was formally transferred to FWS and is now part of the Great Swamp National Wildlife Refuge	September 2002	
Second Five-Year Review completed	September 2005	
Final Close-Out Report for OU1, OU2 and OU3 completed	November 2009	
Deletion of OU1, OU2 New Vernon Road, and OU3	July 2010	

III. Background

Physical Characteristics

OU1 consists of the Millington site which is an 11-acre commercial property located at 50 Division Avenue in Millington, New Jersey. The site is bounded on the west by the Passaic River, on the north by the Millington Train Station, and on the east and south by commercial and private residences, respectively.

OU2 includes the New Vernon Road and White Bridge Road sites. The OU2 New Vernon Road site is located at 237 New Vernon Road in Meyersville, Long Hill Township, Morris County, New Jersey. It consists of approximately 30 acres of land and is currently bounded by the Great Swamp National Wildlife Refuge (GSNWR) to the north, tracts of wooded and wetland areas to the east and south, and New Vernon Road to the west. The property previously included two residences and a large garage structure.

The White Bridge Road site is located at 651 White Bridge Road in Long Hill Township, NJ. It is approximately two miles away from the New Vernon Road site and consists of approximately 12-acres of land, as well as adjoining property, which is part of the GSNWR, in Meyersville,

New Jersey. The site is bounded by White Bridge Road to the north, the GSNWR to the east and southeast, Black Brook to the southwest, and a wooded lot to the west. One private residence, including a two-story home, garage, two sheds and three stables, is currently located on the site. The property also includes a series of fenced-in grazing fields.

(See Figures 1 and 2 for the Site Location Maps)

Geology/Hydrogeology

The Millington property is located between the Second and Third Watchung Basalts. The bedrock geology in this area consists of coarse-grained siltstone of the Towaco formation. The overall geology at this property consists of fill that is situated on a silt/clay deposit that directly overlies bedrock. The New Vernon Road and White Bridge Road properties consist of unconsolidated deposits of various composition that are present throughout the site in various thicknesses and depths. The existence and spatial distribution of these deposits is typical of glacial and swamp deposits.

At the Millington property, groundwater flow is in an east-west direction toward the Passaic River under the influence of bedrock topography. Groundwater flow direction at the New Vernon Road property is in a southwest to northeast direction with an extremely low gradient which is indicative of slow groundwater flow. The water table fluctuates from a depth of one to five feet from the surface. Groundwater flow direction at the White Bridge Road property is northeast toward the Great Swamp National Wildlife Refuge. There is a low groundwater gradient which suggests that groundwater movement is slow.

Land and Resource Use

Four large commercial buildings are located at OU1 and are used for office space in addition to a parking lot which is used for trailer truck parking. There is no access to the asbestos-containing area from the parking lot as it is enclosed by a locked entrance gate, chain link fence and retaining wall. The OU2 New Vernon Road property consists of one residence and a large garage structure. The OU2 White Bridge Road property is used for residential purposes as well as for a horse boarding business. One private residence, including a two-story home, garage, two sheds and three stables, is currently located on the site. The property also includes a series of fenced-in grazing fields.

History of Contamination

Manufacturing of asbestos-containing material (ACM) began at the Millington site in 1927 by Asbestos, Ltd., which engaged in the fiberization and sale of asbestos until 1946. While the property had changed ownership over the years, ACM continued to be produced until 1975 when the plant was closed by the National Gypsum Company (NGC), the owner at the time. During the period in which the asbestos manufacturing facility was in operation, asbestos-containing waste had been disposed of on the Millington site. This included a 330-foot by 75-foot area

(referred to as the asbestos mound) where predominantly asbestos fibers, siding and roofing material were disposed. When the Millington site had reached its capacity for on-site disposal, asbestos-containing waste materials were disposed of off-site at the New Vernon Road, White Bridge Road, and the Dietzman Tract sites.

Initial Response

In September 1984, EPA issued a notice letter to the NGC notifying the company of its liability as a Potentially Responsible Party (PRP) and offering the company an opportunity to conduct a Remedial Investigation (RI) and feasibility study (FS). In April 1985, EPA issued an Administrative Order to NGC to conduct the RI/FS at the four properties comprising the Site. NGC performed RI activities in 1986 and 1987 (hereinafter referred to as the NGC RI). EPA performed oversight of these activities. In May 1987, the RI report was submitted to EPA. Upon review, EPA determined that while the NGC RI had adequately characterized contamination at the Millington site, the RI failed to adequately characterize the nature and extent of contamination at the New Vernon Road, White Bridge Road and Dietzman Tract sites. In September 1989, EPA issued a Unilateral Administrative Order (UAO) to NGC, for the performance of the remedial design and remedial action at the Millington site. In August 1990, EPA collected and analyzed soil and dust samples at the New Vernon Road and White Bridge Road sites. Contrary to data reported in NGC's RI report, high levels of asbestos were detected. EPA determined that an immediate removal action was necessary to address the imminent threat posed by the sites. In 1990, federally funded, temporary actions were conducted to immobilize asbestos contamination at the New Vernon Road and White Bridge Road sites. Removal activities were conducted at each property in response to a Health Advisory issued by the Agency for Toxic Substances and Disease Registry. These removal actions included: erecting signs and fences, sampling of air and soil, capping two driveways, covering visible asbestos-containing materials with geotextile fabric, removing a dilapidated shed, and removing asbestos-containing materials from the ground surface.

In October 1990, NGC filed a voluntary bankruptcy petition. In May 1991, EPA filed a Proof of Claim for past costs at the Millington, New Vernon Road and White Bridge Road sites. EPA was awarded settlement costs for the remediation of the Millington site, New Vernon Road and White Bridge Road sites. As part of the settlement agreement, NGC was relieved of its remedial design/remedial action obligations under the 1989 Administrative Order.

During removal activities in 1990, EPA initiated a RI/FS at the New Vernon Road and White Bridge Road OU2 sites to supplement the NGC RI and fully characterize the nature and extent of asbestos contamination. Field work was completed in the fall of 1990 and the RI and FS reports were completed in June 1991.

IV. Basis for Action

During the OU1 and OU2 RI, soil, surface water and groundwater samples were collected and air monitoring was performed to determine the extent of contamination and associated risks. It was

determined that asbestos was the primary contaminant of concern. Note that mercury was detected in concentrations exceeding drinking water standards in groundwater samples at OU1; however, the contamination was confined to the area beneath the OU1 asbestos mound and is not expected to impact public health and the environment. Groundwater from the OU1 portion of the Site migrates directly into the Passaic River, which has not been adversely impacted by groundwater discharges from the Site. In addition, the area surrounding the OU1 property is served by a public water supply system and there are no downgradient potable wells within the vicinity of OU1.

Asbestos was found in the form of broken tiles, siding and fibers at the Site. Asbestos was not detected above the federal maximum contaminant level (MCL) in the surface water and groundwater samples. Airborne asbestos was the primary route of asbestos exposure. Therefore, EPA established a remediation goal for contaminated soils, which are the source of airborne asbestos. The main objectives of the remedies for OU1 and OU2 were to contain the migration of asbestos-containing material and to eliminate exposure pathways that could present unacceptable risks.

V. Remedial Actions

Remedy Selection and Implementation

OU1 Remedy Selection

On September 30, 1988, EPA issued a Record of Decision (ROD) for OU1. The major components of the selected remedy include the following: 1) installation of a two-foot soil cover on areas of exposed or minimally covered asbestos; 2) installation of a chain-link security fence to restrict access to the asbestos mound; 3) construction of slope protection/stabilization measures along the asbestos mound embankment; 4) construction of surface runoff diversion channels on top of the asbestos mound; 5) operation and maintenance of the remedy; 6) long-term monitoring; 7) institutional controls to restrict on-site groundwater usage and limit development on the asbestos fill areas; and 8) treatability studies of technologies for permanent destruction or immobilization of asbestos.

OUI_Remedy Implementation

OU1 remedial action activities were conducted pursuant to the 1988 ROD. EPA entered into an Interagency Agreement (IAG) with the U.S. Army Corps of Engineers (USACE) who in turn provided oversight during all remedial activities. USACE contracted with IT Corporation (IT) to complete the remedial actions in accordance with the contract documents and all applicable state and federal regulations.

Mobilization activities began on June 17, 1999 and included the delivery of general materials, initiation of soil erosion and sediment control measures, and clearing and grubbing activities.

The primary remedial construction activities included, but were not limited to, the following: 1) access road construction - completed in November 1999; 2) retaining wall construction for slope stabilization - completed in May 2000; and 3) cap construction operations and site restoration completed in May 2000. Capping activities consisted of relocating excavated material, closing the asbestos mound, grading the ACM to the required elevations, installation of a layer of geotextile and geogrid material, and the placement and grading of a two-foot soil cover. A retaining wall was installed at the toe of the asbestos mound for stabilization purposes. The wall is an average of 10 feet in height and 516 feet long. The Final RA Report for OUI was approved by EPA in September 2001. EPA also conducted treatability studies to fulfill the OU1 ROD requirement for evaluating innovative treatment technologies that may be effective in permanently remediating asbestos. Since the issuance of the OU1 ROD, EPA has performed treatability studies on solidification/stabilization and vitrification (thermal treatment resulting in an asbestos-free glass) and has evaluated potential applicability of thermochemical asbestos conversion (destruction) technologies. EPA believes that the OU1 remedy, including the cap constructed over the ACM waste and institutional controls, is protective and will remain protective of human health and the environment. Solidification and stabilization of the ACM was incorporated into the OU2 remedy.

With respect to institutional controls, in accordance with the New Jersey Department of Environmental Protection (NJDEP), a Deed Notice was filed by Tifa Realty, Inc., in the Morris County, New Jersey, Office of the County Clerk, on September 8, 2008 for the OU1 Millington property designated as Block 12301, Lot 1 on the Long Hill Township tax map. The Deed Notice has been filed in Deed Book 21152, Page 508. The Millington property is approximately 11 acres, with the restricted area comprising approximately five acres. The landfill, which is located on the five-acre restricted area, is surrounded by a fence, and contains approximately 90,000 cubic yards of asbestos and asbestos-containing materials. The restrictions placed on the OU1 Millington property significantly limit any type of intrusion onto the landfill, thereby restricting on-site groundwater usage and limiting development on the asbestos fill areas. Any use of the landfill area must be designed to protect the integrity of the components of the landfill remedy.

O&M activities are ongoing and are performed by NJDEP.

OU2 Remedy Selection

On September 27, 1991, EPA issued a ROD selecting the Remedial Actions (RAs) for both the New Vernon Road property and the White Bridge Road property (collectively, designated OU2). The major components of the selected remedy include the following: 1) in-situ solidification/stabilization of asbestos-contaminated soils; 2) appropriate environmental monitoring to confirm the effectiveness of the remedy; and 3) implementation of institutional controls to restrict future subsurface activities and assure the integrity of the treated waste.

EPA issued an Explanation of Significant Differences (ESD) on October 20, 1993 to modify the remedy specified in the OU2 ROD. The ESD documented the change in

solidification/stabilization depth which called for the solidified/stabilized mass to be constructed above the groundwater table.

OU2 Remedy Implementation

New Vernon Road

Remedial activities For the New Vernon Road site were conducted in two phases. Phase I activities were initiated in August 1994 and were completed in December 1994. Phase I activities included the following: 1) excavation and consolidation of ACM; 2) in-situ solidification/stabilization of ACM; 3) impermeable cover and perimeter infiltration trench construction; 4) placement of rip rap along the sides of the cap for slope stability protection; and 5) backfill of excavation areas excluding topsoil and seeding. Upon completion of the solidification/stabilization process, the site was graded and a protective cap was placed over the solidified material. The protective cap consisted of several components including six inches of stone screenings, a geomembrane liner, a drainage layer consisting of a geocomposite, a 24-inch layer of common fill and a vegetative layer consisting of six inches of topsoil and grass. After the implementation, air monitoring was performed to demonstrate the effectiveness of this remedy.

The second phase of the remedial action activities was initiated in March 1995 and was intended to include site restoration work such as final grading with topsoil, grass establishment, planting, wetlands restoration, asphalt paving, and demobilization. The second phase was halted when EPA issued a Stop Work Order on March 30, 1995. EPA subsequently issued a Cure Notice, in April 1995, to CDM Federal Programs Corporation (CDM), an EPA contractor, for failure to meet the contract specification for the use of fill at both the New Vernon Road and White Bridge Road properties. The Cure Response cleanup activities at New Vernon Road were initiated in July 1998 along with restoration activities, and completed by March 1999. The USACE provided oversight of the Cure Response cleanup activities. In September 2000, EPA approved the Remedial Action Report for the New Vernon Road portion of OU2.

In 1998, EPA acquired the New Vernon Road site from the residential owners. In January 2002, EPA, NJDEP and the U.S. Fish and Wildlife Service reached an agreement on the terms of the transfer of a portion of the New Vernon Road property to FWS to expand the GSNWR. In September 2002, an approximate 25-acre portion of the New Vernon Road property (Block 225, Lot 30) was formally transferred to FWS and is now in use as part of the GSNWR. This Lot also includes the residential structures along New Vernon Road. The remaining five-acre portion of the property (Block 225, Lot 30.03), which contains the solidified ACM, was transferred to the State of New Jersey. NJDEP is conducting the O&M activities on the five-acre parcel of the property.

Subsequent to the division of the New Vernon Road property between NJDEP and FWS, separate Deed Notices were filed for Block 225, Lots 30 and 30.03. The Deed Notice for Block 225, Lot 30 was filed in the Morris County, New Jersey, Office of the County Clerk on August 20, 2002. The Deed Notice includes a "Limited Subsurface Use Area" which exists

within 10 feet of the foundation of the residences. This area is restricted because it could not be fully investigated for the presence of asbestos since such investigation would have compromised the integrity of the substructure. Digging and excavating more than 12 inches below the surface of the Limited Subsurface Area is prohibited unless approved by EPA or NJDEP. The Deed Notice for Block 225-Lot 30.03, which pertains to the five-acre capped OU2 parcel, was filed in the Morris County, New Jersey, Office of the County Clerk on October 22, 2002. The Deed Notice specifies the restrictions placed on the capped area of OU2. The Deed Notice does not permit any disturbance of the surface or subsurface of the capped area including, but not limited to filling, drilling, excavation, or the removal of topsoil, sediments, rock or minerals, or by construction, planting anything other than grass or wildflowers, or changing the topography in any manner; however, topsoil may be added to make repairs in accordance with the Deed Notice. Changing, damaging or removing the perimeter trench around the solidified mass, the manholes or the monitoring wells is also prohibited.

White Bridge Road

Remedial construction activities for the White Bridge Road property were initiated in June 1994. The first phase of activities included excavation, solidification, backfilling and construction of the impermeable cover. Field work occurred between August 1994 and December 1994. ACM was excavated and consolidated into one central area of the White Bridge Road property. A higher volume of ACM was excavated than initially anticipated; therefore, a settlement analysis of the solidified mass was performed. Analytical results indicated that additional settlement of up to nine inches could occur, which would place the solidified mass in contact with the groundwater. As a result, the initial design solidification depth was reduced to ensure that the solidified mass did not come in contact with the water table. This change in design was documented in an ESD, dated October 20, 1993. Approximately 25,000 cubic yards of asbestos-contaminated material was treated at the White Bridge Road site. The final depth of the solidified ACM was approximately 2.5 feet below the ground surface.

An impermeable cover was constructed over the solidified mass. The cover consisted of six inches of stone screenings, an impermeable high density polyethylene liner, a geonet drainage layer, 24 inches of common fill, and six inches of topsoil which was subsequently seeded. A perimeter trench was also installed in conjunction with the impermeable liner. The trench was three feet deep and five feet wide located on three sides of the landfill approximately three feet from the edge of the solidified mass. A minimum of a nine-inch layer of course aggregate was placed at the bottom of the trench followed by perforated and corrugated flexible pipe lain on the stone bed. At original grade, the geotextile fabric was wrapped across the top of the trench and overlapped. Furthermore, the trench was finished with a sloped layer of four-inch stone. A drainage layer, consisting of geosynthetic materials was placed over the geomembrane and common fill was placed over the drainage layer. The final layer consisted of topsoil which was seeded to stabilize the soil and establish grass cover.

The second phase of remedial construction activities included site restoration. Site restoration included topsoil placement, fence construction, monitoring well installation, stockpile removal, seeding and landscape replacement. This phase was conducted between March and November

1995.

After implementation of the first phase of the remedy, EPA discovered that some of the fill material, which was used by the contractor on the White Bridge Road property, had originated from a facility subject to the New Jersey Cleanup Responsibility Act, now the Industrial Site Recovery Act. On April 7, 1995, EPA issued a Cure Notice to CDM, indicating that this material failed to meet the contract specifications for fill. This was the same Cure Notice that was issued for the New Vernon Road property, as described in the previous section. The unacceptable fill was address by placing a three-inch layer of stone screening over the unacceptable fill in the stable area and removing five cubic yards of unacceptable fill from the stockpile area. The work performed under the Cure Notice Response Workplan was completed on August 28, 1995 and was performed at no cost to EPA or the State.

On January 5, 2001, the owners of the OU2 White Bridge Road property filed a Deed Notice with the Morris County Clerk. EPA and the State of New Jersey agreed on the terms of the Deed Notice. The Deed Notice has the same general restrictions as those included in the New Vernon Road Deed Notice whereby any disturbance of the surface or subsurface cap is strictly prohibited. In addition, the White Bridge Road Deed Notice specifically prohibits the following: horseback riding; any activity that might compromise the integrity of the solidified mass or its cap; and moving the fence posts installed on the top of the solidified mass area.

In February 2002, EPA deleted the White Bridge Road portion of the Asbestos Dump Superfund Site from the NPL. The remaining portions of the Site, including OU1, OU2-New Vernon Road and OU3, were deleted in July 2010.

System Operations/Operation and Maintenance

OU1

In September 2001, EPA approved the 30-Year Operations and Maintenance (O&M) Plan. NJDEP is currently responsible for O&M activities. The O&M Plan documents the installation of a six-foot high chain link security fence with surrounds the site on its north, east and south limits. A double swing gate is located on the northeastern corner of the site which provides access to the OU1 site. Furthermore, the O&M Plan specifies that periodic inspections be conducted of all OU1 design components including the retaining wall, perimeter access fence, capped area. Mowing/pruning of the ACM cover and surrounding areas are performed regularly. Monitoring of surface water and sediment sampling of the Passaic River, along with groundwater monitoring performed in accordance with the New Jersey landfill closure requirements and the Sampling and Analysis Plan, are included in the O&M Plan. Currently, groundwater, surface water and sediment sampling is conducted once every five years.

OU2 - New Vernon Road

The O&M plan for the New Vernon Road site was finalized in June 2001. The overall objective of the O&M Plan is to provide for periodic inspection, maintenance, and monitoring to evaluate and maintain the effectiveness of the remedy implemented at the site. The landfill cap, perimeter

infiltration trench and environmental monitoring, are the key components of the O&M Plan. Environmental monitoring includes the collection and analysis of groundwater. Environmental monitoring is conducted once every five years.

OU2 - White Bridge Road

An O&M Plan was developed for the White Bridge Road site in July 2001. The O&M Plan includes the maintenance and monitoring of site features including the landfill cap, perimeter infiltration trench, and environmental monitoring. O&M obligations are shared between both the property owners and NJDEP. Property owners are largely responsible for mowing and maintaining the capped area along with maintaining other site features while NJDEP is primarily responsible for the environmental monitoring activities. Details of the O&M obligations are outlined in the January 2001 Deed Notice. Groundwater monitoring is conducted once every five years.

VI. Progress Since the Last Review

The first Five-Year Review was conducted in September 2000. The second Five-Year Review (second review) for the Site was completed in September 2005. Both reviews indicated that the remedies for OU1 and OU2 were functioning as intended and that the Site remains protective of human health and the environment. Previous Five-Year Reviews did not identify any issues or recommendations.

Groundwater, surface water and sediment monitoring activities have been conducted since the second review. In April 2008, NJDEP collected groundwater samples from 13 monitoring wells: seven wells at OU1, three wells at OU2-New Vernon Road and three wells at OU2-White Bridge Road. In addition, surface water samples were collected from five locations along the Passaic River in the vicinity of the OU1 property.

Additional sampling was conducted by EPA in June 2010. Samples were taken from five groundwater monitoring wells at OU1, three wells at OU2-New Vernon Road and three wells at OU2-White Bridge Road. In addition, surface water and sediment samples were collected from five locations along the Passaic River in the vicinity of the OU1 property. Groundwater, surface water and sediment samples were analyzed for asbestos.

A Deed Notice was filed by Tifa Realty, Inc. in the Morris County, New Jersey, Office of the County Clerk, on September 8, 2008 for the OU 1 Millington property designated as Block 12301, Lot 1 on the Long Hill Township tax map. The types of restrictions placed on the OU1 Millington property significantly limit any type of intrusion onto the landfill, thereby restricting on-site groundwater usage and limiting development on the asbestos fill areas. Any use of the landfill area must be designed to protect the integrity of the landfill components.

EPA, with concurrence of the State of New Jersey through the NJDEP, has determined that all appropriate response actions under CERCLA, other than operation and maintenance, and Five-

Year Reviews, have been completed. In February 2002, the White Bridge Road portion of the Site was deleted from the NPL. In May 2010, EPA published an announcement in the *Daily Record*, a local newspaper in Morris County, NJ, notifying the public of EPA's intention to delete the OU1, OU2-New Vernon Road and OU3 portions of the Site from the NPL. The notice of intent to delete and notice of deletion were also published in the Federal Register. The public comment period for the Site deletion closed on June 10, 2010. No public comments were received pertaining to the deletion notices; therefore, deletion of the Site became effective on July 12, 2010.

VII. Five-Year Review Process

Administrative Components

The Asbestos Dump Superfund Site Five-Year Review process was triggered by the initiation of the OU2 remedial action. The first Five-Year Review was completed in 2000. In September 2005, EPA conducted a second Five-Year Review. The 2005 Five-Year Review included a site inspection to assess whether the OU1 and OU2 remedy had been constructed as designed as well as to determine whether current conditions at the Site were protective of human health and the environment. The 2005 Five-Year Review determined that the implemented remedies for OU1 and OU2 continued to provide adequate protection of public health and the environment.

For this Five-Year Review, the review team consisted of Theresa Hwilka (EPA - RPM), Diana Cutt (EPA - Geologist), Mindy Pensak (EPA – Biological Technical Assistance Group) and Marian Olsen (EPA - Risk Assessor).

Community Involvement

Throughout the implementation of the remedies, EPA maintained regular contact with town representatives and community groups, particularly during construction activities. More recently, EPA notified the community of the initiation of the 2010 Five-Year Review process by publishing a notice in the *Echoes Sentinel* on July 1, 2010. The notice indicated that EPA would be conducting a Five-Year Review of the remedies at the Asbestos Dump Site to ensure the remedies remain protective of public health and are functioning as designed. In addition, the notice indicated that once the Five-Year Review process was completed, the results would be made available to the public at the Long Hill Township Public Library in Gillette, New Jersey as well as the EPA Records Center at EPA's New York Office.

In May 2010, EPA published an announcement in the *Daily Record*, a local newspaper in Morris County, NJ, notifying the public of EPA's intention to delete the OU1, OU2-New Vernon Road and OU3 portions of the Site from the NPL. The notice of intent to delete and notice of deletion were also published in the Federal Register. The public comment period for the Site deletion closed on June 10, 2010. No public comments were received pertaining to the deletion notices; therefore, the Site deletion became effective on July 12, 2010.

Document Review

This Five-Year Review consisted of a review of relevant documents including O&M records, monitoring data, the Final Close-out Report and the Deletion Notice. Please see Attachment B for a full list of reviewed documents.

Data Review

Groundwater, surface water and sediment monitoring activities have been conducted since the second Five-Year Review. In April 2008, NJDEP collected groundwater samples from 13 monitoring wells: seven wells at OU1, three wells at OU2-New Vernon Road and three wells at OU2-White Bridge Road. In addition, surface water samples were collected from five locations along the Passaic River in the vicinity of the OU1 property. All samples were analyzed for asbestos. Results indicated that asbestos was not detected in any of the groundwater or surface water samples; however, there were some analytical sensitivity issues with some of the OU2 groundwater samples.

An additional sampling event was conducted by EPA in June 2010 in accordance with the OU1 and OU2 O&M plans. Samples were taken from five groundwater monitoring wells at OU1, three wells at OU2-New Vernon Road and three wells at OU2-White Bridge Road. In addition, surface water and sediment samples were collected from five locations along the Passaic River in the vicinity of the OU1 property. Groundwater, surface water and sediment samples were analyzed for asbestos.

Groundwater

Asbestos was not detected in any of the groundwater samples from 2008 or 2010 for OU1, OU2-New Vernon Road and OU2-White Bridge Road. However, there were a few instances in which the analytical sensitivity levels for groundwater samples were greater than the 7 million fibers per liter (MFL) which is the MCL for asbestos in groundwater. For the 2008 data, monitoring wells MW-A and MW-C, located at OU2-New Vernon Road, had analytical sensitivity levels of less than 10 MFL. For the 2010 data, monitoring well MW-907, located at OU1, and MW-A, located at OU2-New Vernon Road, had analytical sensitivity levels of less than 24 MFL and 16 MFL, respectively. Past data indicated that asbestos has not been detected in these wells; therefore, the analytical sensitivity issue is not perceived to be a cause for concern. Additional sampling will be conducted to ensure that the groundwater continues to meet the cleanup goals.

Surface Water

For both the 2008 and 2010 data, asbestos was not detected in any surface water samples collected at the five sample locations along the Passaic River in the vicinity of the OU1 portion of the Site.

Sediment

Five sediment samples were collected during the 2010 sampling event. Asbestos was either not detected or was below the analytical sensitivity level for four of the five sediment samples. One sample, located upstream of the OU1 property, was determined to have 1.5% Chrysotile asbestos. This upstream sample was taken from the river and was submerged under several inches of water. Accordingly, the sample area is expected to remain adequately wet and the friability of the asbestos detected at this location is not a concern. Historically, the sediments have not contained elevated levels of asbestos. Since this sample is inconsistent with previously reported data, additional sampling will be performed to confirm the presence of asbestos in the vicinity of the upstream sample location.

Site Inspection

An inspection of OU1 and OU2 of the Asbestos Dump Site was conducted on February 1, 2010. The following parties were in attendance:

Theresa Hwilka, EPA Region II Project Manager; Diana Cutt, EPA Region II Geologist; Marian Olsen, EPA Region II Risk Assessor; and Mindy Pensak, EPA Region II Biological Technical Assistance Group

The Site inspection consisted of a physical inspection of the OU1, OU2-New Vernon Road and OU2-White Bridge Road portions of the Asbestos Dump Superfund Site. Inspection findings for each area are presented below.

OU1

The inspection team met with Tifa Realty Inc.'s Property Manager, Richard Branagan, CB Richard Ellis, Inc., near the OU1 access gate. The security fence was locked upon arrival and Richard Branagan unlocked the gate and allowed EPA access to the OU1 property. The inspection team walked across the top of the asbestos mound and inspected integrity and grade of the cap along with the groundwater monitoring wells. The cap appeared to be in good condition; however, there is a slight dip in the cap between the security fence and the rear retaining wall that should be monitored over time. There are three groundwater monitoring wells located on the cap: MW-902 (Permit No. 2528289); MW-903 (Permit No. 2528292); and MW-904 (Permit No. 2528294). MW-902 was not locked, the inside well cap was missing and there was evidence of erosion around the base of the well (cement pad) that will need repairs. The inspection team walked around the foot of the mound (western edge) and observed that the retaining wall was in good condition. MW-905 and MW-907 were also inspected. Both wells were properly locked and appeared to be in good condition. During the June 2010 sampling event, EPA staff installed new locks on each groundwater monitoring well. The minor erosion of sections of the concrete well pads will be repaired and missing well caps will be replaced as part of routine O&M activities.

OU2 - White Bridge Road

The OU2 property owners escorted EPA around the OU2-White Bridge Road portion of the Site. There are three groundwater monitoring wells located at the White Bridge Road property: MW-D (Permit No. 2546904); MW-E (Permit No. 2546902); and MW-F (Permit No. 2546903). All monitoring wells were locked and appeared to be well maintained. During the inspection of MW-F, leftover rolls of tarp were observed on the ground near the well. The tarp rolls were likely leftover from previous O&M activities. The NJDEP will be notified to remove these rolls from the OU2 property. The inspection team walked around the perimeter of the landfill area. The rip-rap material around the cap was well maintained as was the upper vegetative portion of the cap. There was no evidence of burrowing animals or drainage issues. Note that EPA replaced all monitoring well locks during the June 2010 sampling event.

OU2 - New Vernon Road

There are three groundwater monitoring wells located at the OU2-New Vernon Road property: MW-A (Permit No. 25283995); MW-B (Permit No. not visible); and MW-C (Permit No. 2545802). The concrete pad at the base of MW-A was slightly damaged and should be repaired. A stainless steel bailer was seen on the ground next to the well and should be removed. MW-B was not locked and the inside cap was not secured. An insect nest was observed on the inside of the outer well cap. Compacted mud was also observed along the outside of the inner well casing which could be indicative of animal activity. MW-C was locked; however, the concrete well pad was slightly damaged and should be repaired. The inspection team walked around the perimeter and across the asbestos cap. The vegetative cap appeared to be well maintained with no obvious signs of drainage issues or breaches in the cap. During the June 2010 sampling event, EPA staff installed new locks on all groundwater monitoring wells. The minor erosion of sections of the concrete well pads will be repaired and missing well caps will be replaced as part of routine O&M activities.

Interviews

During the Site inspection, EPA spoke with representatives of NJDEP, FWS, and the OU1 and OU2-White Bridge Road property owners. No significant issues related to the Five-Year Review inspection were noted. Prior to the Site inspection, EPA also spoke with representatives of NJDEP regarding the remedies and NJDEP indicated that they did not have any specific concerns involving the selected remedies.

VIII. Technical Assessment

Question A: Is the remedy functioning as intended by the decision documents?

The primary objectives of the 1988 and 1991 RODs for OU1 and OU2, respectively, are to control the source of contamination at the site and to minimize any potential human health and ecological impacts resulting from exposure to contaminants at the site. To meet these

objectives the remedial actions included:

OU1. The remedy included the installation of a soil cover, installation of a fence with locked entrance, slope stabilization, monitoring and implementation of institutional controls. A Deed Notice was filed by Tifa Realty, Inc., in the Morris County, New Jersey, Office of the County Clerk, on September 8, 2008 for the OU1 Millington property. The type of restrictions placed on the OU1 Millington property significantly limit any type of intrusion onto the landfill cap thereby restricting on-site groundwater usage and limiting development on the asbestos fill areas. Any future use of the landfill area must be designed to protect the integrity of the components of the landfill. The State of New Jersey is performing routine O&M to assure the integrity of the cap is maintained.

OU2. The asbestos-containing material (having greater than 0.5% asbestos, which was the Transmission Electron Microscopy analytical method detection limit) was consolidated into one area and solidified followed by placement of a cap. The remedy consisted of the solidification/stabilization of asbestos-contaminated soils at the New Vernon Road and White Bridge Road sites along with monitoring to confirm the effectiveness of the remedy; and implementation of institutional controls to restrict future subsurface activities and assure the integrity of the treated waste.

On January 5, 2001, the owners of the OU2 White Bridge Road property filed a Deed Notice with the Morris County Clerk. EPA and the State of New Jersey agreed on the terms of the Deed Notice. The Deed Notice prohibits any disturbance of the surface or subsurface cap is strictly prohibited. In addition, the White Bridge Road Deed Notice specifically prohibits the following: horseback riding; any activity that might compromise the integrity of the solidified mass or its cap; and moving the fence posts installed on the top of the solidified mass area.

Subsequent to the division of the New Vernon Road property between NJDEP and FWS, separate Deed Notices were filed for Block 225, Lots 30 and 30.03.

- The Deed Notice for Block 225, Lot 30 was filed in the Morris County, New Jersey, Office of the County Clerk on August 20, 2002. The Deed Notice includes a "Limited Subsurface Use Area" which exists within 10 feet of the foundation of the residences. This area is restricted because full investigation for the presence of asbestos would compromise the integrity of the substructure. The deed restrictions prohibit digging and excavating more than 12 inches below the surface of the Limited Subsurface Area unless approved by EPA or NJDEP.
- The Deed Notice for Block 225-Lot 30.03, which pertains to the five-acre capped OU2 parcel, was filed in the Morris County, New Jersey. The Deed Notice does not permit any disturbance of the surface or subsurface of the capped area including, but not limited to filling, drilling, excavation, or the removal of topsoil, sediments, rock or minerals, or by construction, planting anything other than grass or wildflowers, or changing the

topography in any manner; however, topsoil may be added to make repairs in accordance with the Deed Notice. Changing, damaging or removing the perimeter trench around the solidified mass, the manholes or the monitoring wells is also prohibited.

The implementation of the remedial actions at OU1 and OU2, along with the institutional controls identified above, have interrupted potential exposures both human and ecological receptors. The remedies are functioning as intended by the decision documents. One exception is the detection of asbestos in one out of five sediment samples taken from the Passaic River upstream of the site. Access to this area is limited by its physical location and the presence of several inches of water over the sample location area. Historically, the sediments have not contained elevated levels of asbestos. Since this sample is inconsistent with previously reported data, additional sampling will be performed to confirm the presence of asbestos in the vicinity of the upstream sample location.

Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives used at the time of the remedy still valid?

Yes, the remedial action objectives used at the time of the remedy still remain valid. There have been no changes in the physical conditions of the Site that would affect the protectiveness of the remedy. The OU1 and OU2 remedies provide a barrier to ecological receptors as well as to direct exposure to asbestos through inhalation, ingestion and dermal contact and remains protective. Institutional controls are in place in order to prevent potential damage to the landfill caps. At the time of the Site inspection, the caps appeared to be well maintained. The remedies have interrupted potential exposures, with the exception of one upstream sediment sample result as described below (Sediment Section).

Groundwater

Groundwater samples were collected by EPA in April 2008 and June 2010 for OU1 and OU2. All samples were analyzed for asbestos. Findings categorized by OU are listed below.

- OU1 The sampling results indicated that asbestos was not detected in any of the groundwater samples collected at OU1 in 2008 and 2010; however, for one 2010 sample (MW-907), there was a reported analytical sensitivity limit of less than 24 million fibers per liter (MFL) which is higher than the federal MCL of 7.0 MFL.
- OU2 New Vernon Road The sampling results indicated that asbestos was not detected in any of the three groundwater samples collected at OU2 New Vernon Road in 2008 and 2010; however, there were a few instances where the analytical sensitivity level was higher than the 7.0 MFL MCL. For the 2008 data, monitoring wells MW-A and MW-C had analytical sensitivity levels of less than 10 MFL. For the 2010 data, monitoring well MW-A had an analytical sensitivity levels of less than 16 MFL.

 OU2 White Bridge Road – The sampling results indicated that asbestos was not detected in any of the three groundwater samples collected at OU2 White Bridge Road in 2008 and 2010.

Soil

The OU1 remedy included the excavation and consolidation of asbestos-contaminated soils to an on-site disposal area; soil erosion and sediment control measures; installation of a 516-foot long by 10-foot high retaining wall at the base of the asbestos mound; slope stabilization measures; installation of a two-foot soil cover over the entire asbestos mound; site restoration activities including grading and re-vegetation of the site; and construction of a chain-link fence around the perimeter of the site to restrict access.

The OU2 remedy included the excavation and consolidation of asbestos-contaminated materials into a central area of the property; *in-situ* stabilization/solidification of the asbestos contaminated material; confirmatory soil sampling; backfilling the excavated area; and construction of a two foot impermeable layer over the solidified material.

The remedies for OU1 and OU2 remain protective since routes of exposure (i.e., ingestion, inhalation and dermal contact with asbestos-contaminated soil) have been interrupted, due to the liners and two foot soil and vegetative cap placed over the landfills, to prevent exposures by potential receptors. At the time of the Site inspection, the caps were well maintained.

Sediment

Five sediment samples were collected in the Passaic River in the vicinity of the OU1 landfill in 2010. The sediment samples were obtained from areas beneath several inches of water. The stretch of the Passaic River from which the samples were taken has limited accessibility, and there is limited potential for exposures.

The sediment sampling was conducted by EPA in June 2010. A total of five samples were collected with four of the samples having no detectable asbestos concentrations above the analytical sensitivity level. One sample had a detection of 1.5% Chrysotile asbestos. Historically, the sediments have not contained elevated levels of asbestos. Access to this area is limited by the physical location and the presence of several inches of water over the sample location area. Historically, the sediments have not contained elevated levels of asbestos. Given that there were no asbestos detections in the groundwater and surface water samples and there is no notable erosion of the asbestos mound, additional sampling will be performed to confirm the presence of asbestos in the vicinity of the upstream sample location.

<u>Vapor Intrusion</u>. Based on the nature of asbestos and the fact that there are no structures located above the landfill areas of OU1 and OU2, further evaluation of the vapor intrusion pathway was not conducted.

The current remedy remains protective since exposures to the contaminated material are not occurring.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

There is no new information that calls into question the protectiveness of the selected remedies.

Technical Assessment Summary

According to the reviewed data and the Site inspection, the OU1 and OU2 remedies are functioning as intended by the decision documents.

IX. Issues, Recommendations and Follow-up Actions

There is one issue to report at this time.

Issue	Recommendations &	Party	Oversight	Milestone	Affects	
	Follow-up Actions	Responsible	Agency	Date	Protectiveness? (Y/N)	
]]		
				,	Current	Future
One sediment	Additional sediment	EPA	EPA	December	N	Y
sample,	samples will be taken	·	,	2010		
located in the	in the vicinity of the					
Passaic River	asbestos detection to					
upstream of	confirm the presence		•			
OU1, had a	of asbestos.				'	
detection of			• •	}		
asbestos.						

X. Protectiveness Statement

Consistent with OSWER Directive #9355.7-03B-P, dated October 2009, and titled "Assessing Protectiveness for Asbestos Sites Supplemental Guidance to Comprehensive Five-Year Review Guidance," the implementation of the remedial actions at OU1 and OU2, along with the institutional controls identified above, have interrupted potential exposures. The remedy is functioning as intended by the decision documents and is protective of public health and the environment.

XI. Next Review

The next Five-Year Review for the NL Industries, Inc. Site should be completed before September 2015.

got. 9, 2010

Approved:

Walter E. Mugdan, Director

Emergency and Remedial Response Division

EPA-Region 2

Attachment A - List of Acronyms

ACM Asbestos-containing material

ARARs Applicable or Relevant and Appropriate Requirements

EPA (United States) Environmental Protection Agency

ESD Explanation of Significant Differences

FS Feasibility Study

FWS U.S. Fish and Wildlife Service

GSNWR Great Swamp National Wildlife Refuge

IAG Interagency Agreement

MCL Maximum Contaminant Level

MFL Million Fibers per Liter

NGC National Gypsum Company

NJDEP New Jersey Department of Environmental Protection

NPL National Priorities List O&M Operation & Maintenance

OU1 Operable Unit One OU2 Operable Unit Two

PRP Potentially Responsible Party

RA Remedial Action RD Remedial Design

RD/RA Remedial Design/Remedial Action

RI Remedial Investigation
RPM Remedial Project Manager

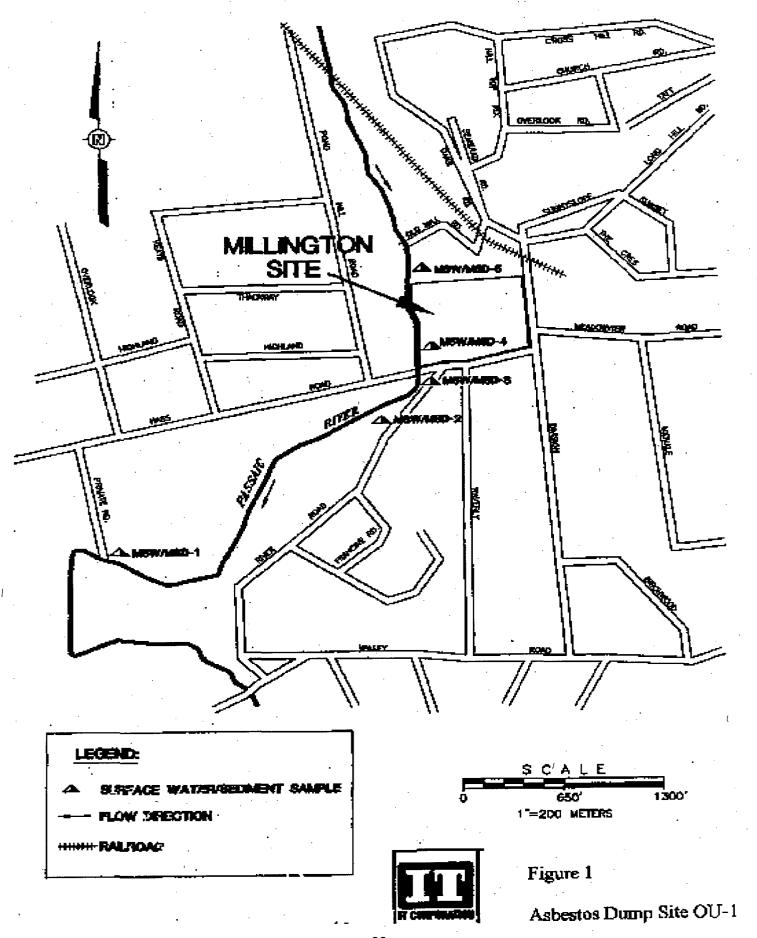
ROD Record of Decision

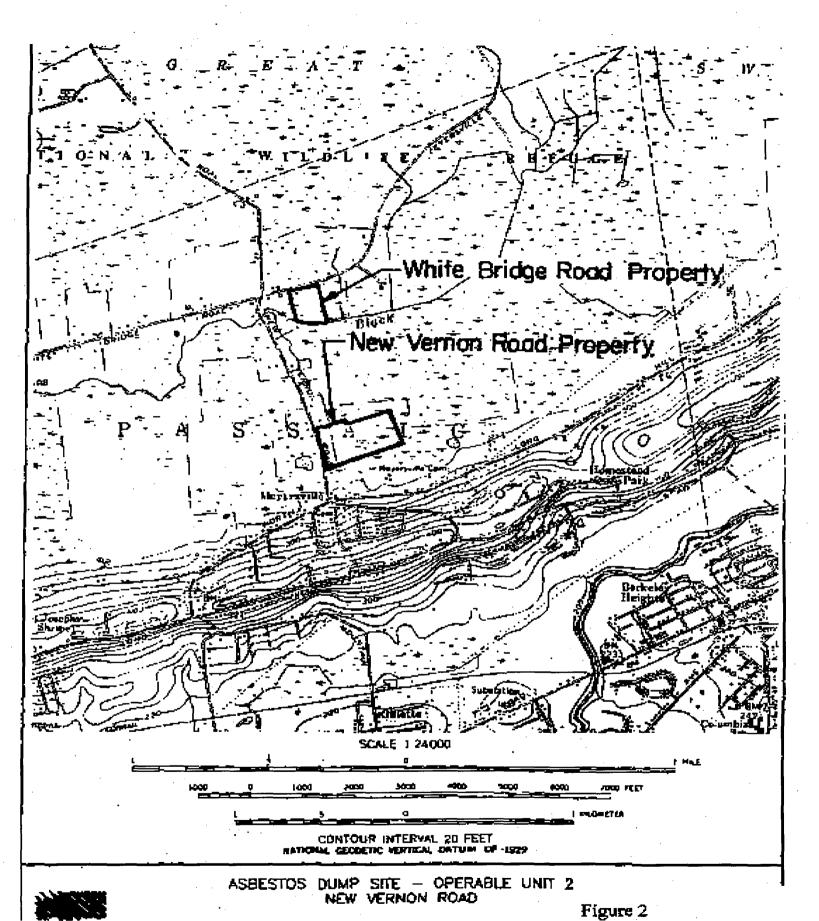
UAO Unilateral Administrative Order

USACE United States Army Corps of Engineers

Attachment B - Documents Reviewed

- U.S. Environmental Protection Agency, "Five-Year Review Report, Asbestos Dump Superfund Site, Meyersville, Morris County, New Jersey," Region 2, New York, New York, September 2005.
- U.S. Environmental Protection Agency, "Record of Decision, Asbestos Dump Millington Site, Millington, New Jersey," September 1988.
- U.S. Environmental Protection Agency, "Record of Decision, Asbestos Dump, New Vernon Road and White Bridge Road Sites, Passaic, New Jersey," September 1991.
- U.S. Environmental Protection Agency, "Operation & Maintenance Plan, Asbestos Dump Site-Operable Unit Two, New Vernon Road Property," June 2001.
- U.S. Environmental Protection Agency, "Operation & Maintenance Plan, Asbestos Dump Site-Operable Unit Two, White Bridge Road Property," July 2001.
- U.S. Environmental Protection Agency, "Operation & Maintenance Plan, Asbestos Dump Site-Operable Unit Two, New Vernon Road Property," June 2001.
- IT Corporation, "30 Year Operation and Maintenance Plan, Asbestos Dump Superfund Site, Operable Unit No. 1, Millington, New Jersey," January 2001.
- New Jersey Department of Environmental Protection, Groundwater and Surface Water Data for Operable Units 1 and 2, April 2008.
- U.S. Environmental Protection Agency, Groundwater, Surface Water and Sediment Data for Operable Units 1 and 2, June 2010.
- U.S. Environmental Protection Agency, "Superfund Final Site Close Out Report, Asbestos Dump Site, Meyersville, Morris County, New Jersey," November 2009.
- U.S. Environmental Protection Agency, "Direct Final Notice of Deletion of the Asbestos Dump Superfund Site from the National Priorities List," April 2010.
- U.S. Environmental Protection Agency, "Notice of intent to Delete the Asbestos Dump Superfund Site from the National Priorities List," April 2010.





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